Before the FEDERAL COMMUINCATIONS COMMISSION

DA 25-219 Released: March 12, 2025
RE: DELETE, DELETE, DELETE
GN Docket No. 25-133

Comments Due: Friday, April 11, 2025

SUMMARY:

With this filing, Turbo Technical Services ("TTS") makes comment in the above noted proceeding, requesting Commission consideration of deletion or modification of specific Rules and Regulations as outlined in the Public Notice. TTS has been involved in FCC application and licensing process since 1981 and has filed thousands of applications for hundreds of clients for AM, FM and FM translator stations and modifications. Their extensive experience with FCC processes gives them a unique and real-world view of the impact of Commission Rules and Regulations.

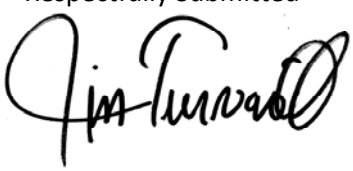
COMMENT:

TTS requests review and deletion of language in 74.1204 (g) with respect to FM translator and booster stations and the protection to other facilities separated by 600 KHz. This is referred to as "Third Adjacent Protection" and should be eliminated.

This technical regulation is a hold-over from the last century when FM receivers utilized simple tuning circuits of discreet components that beat against a local oscillator. Since the 1980's that technology has been replaced by Phase-Locked-Loop direct FM tuning circuits, making input tuning much more sensitive and discriminating. Experience in the LPFM service has demonstrated that low power stations to not cause or receive interference from Third-Adjacent stations and this protection is obsolete. Translator stations operate on Second-Adjacent channels to other signals with demonstration of no actual interference; protection to Third-Adjacent stations is a deterrent to facility modification and limiting site selection options.

While there was certainly a time when this regulation was necessary, that time is long gone because of technical advances in FM receiver design and manufacture. The site restrictions caused by these rules force licensees to operate at less than optimal locations, offer restricted coverage area and service to their communities and often operate at less than allowed effective radiated power. A thorough review of these technical restrictions is hereby encouraged.

Respectfully Submitted



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Turbo Technical Services